

04-00035

CIVIL COVER SHEET

The JS-44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

I. (a) PLAINTIFFS

The Government of Guam, by and through the Attorney General of Guam

(b) COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF Guam
(EXCEPT IN U.S. PLAINTIFF CASES)

DEFENDANTS

Felix P. Camacho, in his official capacity as Governor of Guam

COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT Guam
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) ATTORNEYS (FIRM NAME, ADDRESS, AND TELEPHONE NUMBER)

Robert M. Weinberg Tel: 475-3324
Office of the Attorney General, Civil Division
Guam Judicial Center, Suite 2-200E
120 West O'Brien Drive, Hagatna, Guam 96910

ATTORNEYS (IF KNOWN)

Shannon Taitano Tel: 475-9206
Legal Counsel, Governor's Office
P.O. Box 2950
Hagatna, Guam 96932

II. BASIS OF JURISDICTION

(PLACE AN "X" IN ONE BOX ONLY)

- ☐ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☒ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES

(For Diversity Cases Only)

(PLACE AN "X" IN ONE BOX FOR PLAINTIFF AND ONE BOX FOR DEFENDANT)

- | | | | | |
|----------------------------|---------------------------------------|---|----------------------------|----------------------------|
| PTF | DEF | | PTF | DEF |
| <input type="checkbox"/> 1 | <input checked="" type="checkbox"/> 1 | Citizen of This State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Citizen of Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Citizen or Subject of a Foreign Country | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |
| | | Incorporated or Principal Place of Business in This State | | |
| | | Incorporated and Principal Place of Business in Another State | | |
| | | Foreign Nation | | |

IV. NATURE OF SUIT

(PLACE AN "X" IN ONE BOX ONLY)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury — Med. Malpractice <input type="checkbox"/> 365 Personal Injury — Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 750 Other Labor Litigation <input type="checkbox"/> 791 Empl. Rel. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 851 HIA (1395ff) <input type="checkbox"/> 852 Black Lung (923) <input type="checkbox"/> 853 DIWC/DIWW (405(g)) <input type="checkbox"/> 854 SSID Title XVI <input type="checkbox"/> 855 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS — Third Party 26 USC 7809	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 510 Selective Service <input type="checkbox"/> 550 Securities/Commodities/Exchange <input type="checkbox"/> 575 Customer Challenge 12 USC 3410 <input type="checkbox"/> 581 Agricultural Acts <input type="checkbox"/> 582 Economic Stabilization Act <input type="checkbox"/> 593 Environmental Matters <input type="checkbox"/> 594 Energy Allocation Act <input type="checkbox"/> 595 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes <input checked="" type="checkbox"/> 990 Other Statutory Actions

V. ORIGIN

(PLACE AN "X" IN ONE BOX ONLY)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from another district (specify)
☐ 6 Multidistrict Litigation
☐ 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

(CITE THE U.S. CIVIL STATUTE UNDER WHICH YOU ARE FILING AND WRITE BRIEF STATEMENT OF CAUSE. DO NOT CITE JURISDICTIONAL STATUTES UNLESS DIVERSITY.)

Quo Warranto and Declaratory Judgment Action with Injunctive Relief demanded challenging defendant's usurpation of powers and duties of the plaintiff under the Organic Act of Guam, 48 U.S.C. § 1421 et seq.

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION
☐ UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ YES ☒ NO

VIII. RELATED CASE(S) (See instructions): IF ANY

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

July 13, 2004

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFF

JUDGE

MAG. JUDGE

RECEIVED

JUL 13 2004

DISTRICT COURT OF GUAM
HAGATNA, GUAM



Office of the Attorney General

Douglas B. Moylan

Attorney General of Guam

Civil Division

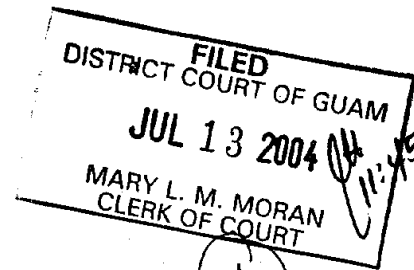
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Attorneys for the Government of Guam

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF GUAM**

THE GOVERNMENT OF GUAM, by and
through the ATTORNEY GENERAL OF
GUAM,

Plaintiff,

vs.

FELIX P. CAMACHO, in his official capacity
as Governor of Guam,

Defendant.

Civil Case No. CV04- **04-00035**

**VERIFIED COMPLAINT IN QUO
WARRANTO; FOR DECLARATORY
JUDGMENT; AND FOR
PRELIMINARY AND PERMANENT
INJUNCTIVE RELIEF**

COMPLAINT

NATURE OF THE ACTION

1. This is a civil action arising under 48 U.S.C. § 1421g(d), the Territory of Guam's Organic Act, relating to the powers and duties of the Office of Attorney General for the Territory of Guam as established by the U.S. Congress. Plaintiff seeks relief in the nature of *quo warranto* against the Governor of the Territory of Guam, Felix P. Camacho, who is unlawfully usurping the functions, powers, duties and Office of the Attorney General, by

ORIGINAL

1 attempting to investigate and oversee the prosecution of suspected criminal wrongdoing in
2 the Territory of Guam. Plaintiff further seeks a declaratory judgment that the Governor of
3 Guam is without authority to appoint any individual in the nature of a "special prosecutor" to
4 investigate and prosecute crimes in the Territory of Guam, and a declaration that the
5 Governor's efforts to do so are a violation of the Organic Act of Guam. Finally, plaintiff
6 seeks appropriate preliminary and permanent injunctive relief against the Governor enjoining
7 him from attempting to exercise any authority with respect to the investigation and/or
8 prosecution of alleged criminal wrongdoing within the Territory of Guam and with respect to
9 the appointment of a "special prosecutor" for the Territory of Guam.
10

11 JURISDICTION AND VENUE

12 2. This action arises under 48 U.S.C. § 1421, the Territory of Guam's Organic Act.
13 Federal question jurisdiction is invoked pursuant to 28 U.S.C. § 1331. The plaintiff seeks
14 declaratory and further necessary and proper relief pursuant to 28 U.S.C. §§ 2201 and 2202,
15 and pursuant to 28 U.S.C. § 1651 ("all writs necessary or appropriate").

16 3. Defendant resides, and a substantial part of the events or omissions giving rise to
17 the claims herein occurred, in the judicial district for the District of Guam. Pursuant to 28
18 U.S.C. § 1391(b), venue is therefore proper in the United States District Court for the
19 District of Guam.
20

21 PARTIES

22 4. Plaintiff is the Government of Guam, by and through its duly elected Attorney
23 General of Guam, Douglas B. Moylan. Pursuant to 48 U.S.C. § 1421g(d)(1), the Attorney
24 General of Guam is the "chief legal officer of the government of Guam."
25

1 5. Defendant Felix P. Camacho is a resident of Guam and the duly elected Governor
2 of Guam.

3 **STATEMENT OF FACTS**

4 6. Douglas B. Moylan is the first duly elected Attorney General for the Territory of
5 Guam, sworn into office on January 8, 2003. By federal law, pursuant to 1998 amendments
6 to the Organic Act, the Office of Attorney General became a "constitutional" officer,
7 established not by local act, but by Congress in the Organic Act. *See* 48 U.S.C. §
8 1421g(d)(1). Previously an office created by local law, subject to appointment and removal
9 by the Governor, federal law now defines the Attorney General as the "chief legal officer" of
10 the Government of Guam. *Id.* In the 1998 amendments to the Organic Act Congress also
11 authorized the Legislature of Guam to decide whether the Attorney General was to be
12 elected. *See* 48 U.S.C. § 1421g(d)(2). The following year, the Legislature of Guam decided
13 that the Office of Attorney General was to be an elected position. *See* P.L. No. 25-44.
14 Accordingly, Douglas B. Moylan now holds office as the first elected constitutionally
15 authorized and empowered Attorney General and chief legal officer for the Government of
16 Guam.
17

18 7. There are no limitations expressed in the Organic Act upon the term "chief legal
19 officer" with respect to the powers, duties and functions of the Attorney General of Guam.
20 Neither the Legislature of Guam, nor any other branch of government is authorized under the
21 Organic Act to intrude upon or otherwise usurp or diminish the powers and duties of the
22 Office of Attorney General. Accordingly, the Attorney General possesses all the powers and
23 duties heretofore known at common law, including but not limited to the sole power and
24 authority to initiate and direct criminal investigations and prosecutions in the name of the
25

1 Government of Guam. The common law powers and duties of the Attorney General also
2 include, but are not limited to, the sole authority to appoint, direct and supervise assistant
3 attorneys general, deputy attorneys general, special assistant attorneys general, and special
4 prosecutors.

5 8. By letter received in the Office of Attorney General July 8, 2004, the Governor of
6 Guam, Felix P. Camacho, formally announced an "ongoing investigation" by his office into
7 alleged violations of the laws of Guam by various public officials and employees of the
8 Government of Guam, including the Attorney General and members of his staff. Invoking his
9 responsibility to "faithful[ly] execut[e] the laws of Guam," the Governor further announced
10 his intent to exercise his powers under the Organic Act of Guam to appoint a "special
11 prosecutor." A true and correct copy of his July 8, 2004 letter to the Office of Attorney
12 General is attached as **Exhibit 1**. The Governor has no such authority under the Organic Act
13 or the laws of Guam.

15 9. In view of the 1998 amendments to the Organic Act establishing the Office of
16 General as a "constitutional" or "organic" office, describing that office as "chief legal officer
17 for the government of Guam, and in view of the 1998 amendments to local law providing
18 that the Attorney General is an elected office, the Governor is no longer authorized to
19 "appoint" anyone to the office of "special prosecutor," assuming he had been in the past
20 Indeed, there is no local law authorized by the Organic Act that empowers the Governor of
21 Guam to "appoint" anyone to the office of "special prosecutor." As the Governor is without
22 authority under the Organic Act to appoint anyone to the office of "special prosecutor," the
23 Governor is without authority to hold that office or exercise any powers or duties associated
24 with or related to such an office. The Governor's exercise of any appointment authority to the
25

1 office of "special prosecutor," or the attempt to exercise any of the functions, powers and
2 duties thereof with respect to the investigation and prosecution of alleged criminal
3 wrongdoing, is unlawful and without authority in violation of the Organic Act.

4 10. The office of "special prosecutor" is not defined by the laws of Guam or by the
5 Organic Act. As a matter of law, the functions, powers and duties of said office, as described
6 in the July 8, 2004 letter attached as Exhibit 1 are functions, powers and duties that, since the
7 1998 Congressional amendments, are wholly reserved to the Office of the Attorney General
8 under the Organic Act. The Governor's exercise of those functions, powers and duties, and
9 intended appointment of a "special prosecutor" usurps the powers and duties of the Office of
10 Attorney General as "chief legal officer" for the Government of Guam; it is an unlawful
11 intrusion into the functions, powers and duties of the Office of Attorney General, a violation
12 of the doctrine of separation of powers, and is therefore unlawful under the Organic Act of
13 Guam.
14

15 CAUSES OF ACTION

16 COUNT I -- QUO WARRANTO

17 11. Defendant Governor Felix P. Camacho is usurping, intruding, and unlawfully
18 exercising the Office of Attorney General with his announced intent to appoint a "special
19 prosecutor," however denominated, because it is the function, and power and duty of the
20 Office of Attorney General alone to investigate and oversee the prosecution of alleged
21 criminal wrongdoing within the Territory of Guam. Accordingly, defendant is due to be
22 enjoined and restrained from exercising or attempting to exercise the powers and duties of
23 said Office.
24
25

1 12. The unlawful usurpation and attempted exercise of investigative and prosecutorial
2 functions of the Office of Attorney General as "chief legal officer" by defendant may be
3 remedied by the issuance of a writ of *quo warranto* by this Honorable Court.

4 **COUNT II -- DECLARATORY JUDGMENT**

5 13. The Governor's exercise of investigative and prosecutorial functions, powers, and
6 duties, and intended appointment of a "special prosecutor" is without basis in the Organic Act
7 and is an impermissible violation of the doctrine of separation of powers, and in particular, a
8 violation of the powers and duties of the Office of Attorney General as "chief legal officer"
9 of the Government of Guam, and thereby violates the Organic Act of Guam, 48 U.S.C. §
10 1421 *et seq.*

11 14. The violation of the Organic Act by the Governor may be remedied by the
12 issuance of a declaratory judgment by this Honorable Court.

13 **COUNT III -- PRELIMINARY INJUNCTION**

14 15. The Governor's exercise of investigative and prosecutorial functions, powers, and
15 duties, and intended appointment of a "special prosecutor" is without basis in the Organic
16 Act and is an impermissible violation of the doctrine of separation of powers, and in
17 particular, a violation of the powers and duties of the Office of Attorney General as "chief
18 legal officer" of the Government of Guam, and thereby violates the Organic Act of Guam, 48
19 U.S.C. § 1421 *et seq.*

20 16. In the absence of preliminary injunctive relief, the Office of Attorney General and
21 the Government of Guam will suffer immediate and irreparable injury, in that the Governor's
22 actions in exercising investigative and prosecutorial functions, powers, and duties, and
23 intended appointment of a "special prosecutor" unlawfully usurps the constitutional and
24
25

1 common law powers and duties of the Office of Attorney General as "chief legal officer" in
2 direct contravention to the doctrine of separation of powers and Congressional intent set forth
3 in the Organic Act, and in direct opposition to the will of the people.

4 17. The violation of the Organic Act by the Governor may be remedied by the
5 issuance of a preliminary injunction by this Honorable Court enjoining and restraining the
6 Governor, his successors, agents, employees, and all those acting in concert with him, from
7 engaging in the conduct complained of herein.

8 **COUNT IV -- PERMANENT INJUNCTION**

9
10 18. The Governor's attempted exercise of investigative and prosecutorial functions,
11 powers, and duties, and intended appointment of a "special prosecutor" is an impermissible
12 violation of the doctrine of separation of powers, and in particular, a violation of the powers
13 and duties of the Office of Attorney General as "chief legal officer" of the Government of
14 Guam, and thereby violates the Organic Act of Guam, 48 U.S.C. § 1421 *et seq.*

15 19. In the absence of permanent injunctive relief, the Office of Attorney General and
16 the Government of Guam will suffer immediate and irreparable injury, in that the Governor's
17 exercise of investigative and prosecutorial functions, powers, and duties, and intended
18 appointment of a "special prosecutor" unlawfully usurps the constitutional and common law
19 powers and duties of the Office of Attorney General as "chief legal officer" in direct
20 contravention to the doctrine of separation of powers and Congressional intent set forth in the
21 Organic Act, and in direct opposition to the will of the people in electing the Attorney
22 General.

23
24 20. The violation of the Organic Act by the Governor may be remedied by the
25 issuance of a permanent injunction by this Honorable Court enjoining and restraining the

1 Governor, his successors, agents, employees, and all those acting in concert with him, from
2 engaging in the conduct complained of herein.

3 **PRAYER FOR RELIEF**

4 **WHEREFORE**, the plaintiff prays that his Honorable Court grant the following
5 relief:

- 6 1. Issue a judgment declaring that defendant Governor Felix P. Camacho is
7 usurping, intruding, and unlawfully holding and exercising the functions, powers
8 and duties of the Office of Attorney General; and ordering defendant Governor
9 Felix P. Camacho enjoined and restrained from exercising the powers and duties
10 of said Office.
- 11 2. Issue a declaratory judgment that the appointment or attempted appointment of a
12 "special prosecutor," however denominated, by the Governor is an impermissible
13 violation of the doctrine of separation of powers, and in particular, a violation of
14 the powers and duties of the Office of Attorney General as "chief legal officer" of
15 the Government of Guam, and thereby violates the Organic Act of Guam, 48
16 U.S.C. § 1421.
- 17 3. Issue a preliminary injunction enjoining the Governor, his successors, agents,
18 employees, and all persons acting in concert with him from exercising or
19 attempting to exercise any of the powers and duties of the Office of Attorney
20 General by, *inter alia*, exercising any authority with respect to the investigation
21 and/or prosecution of suspected crimes or criminal activity within the Territory
22 of Guam, said authority being entirely within the powers and duties exclusively
23 reserved to the Attorney General as Chief Legal Officer; or by appointing or
24 reserved to the Attorney General as Chief Legal Officer; or by appointing or
25 reserved to the Attorney General as Chief Legal Officer; or by appointing or

1 attempting to appoint a "special prosecutor," however denominated, to investigate
2 and prosecute allegations of criminal wrongdoing within the Territory of Guam.

- 3 4. Issue a permanent injunction enjoining the Governor, his successors, agents,
4 employees, and all persons acting in concert with him from exercising or
5 attempting to exercise any of the powers and duties of the Office of Attorney
6 General by, *inter alia*, exercising any authority with respect to the investigation
7 and/or prosecution of suspected crimes or criminal activity within the Territory
8 of Guam, said authority being entirely within the powers and duties exclusively
9 reserved to the Attorney General as Chief Legal Officer; or by appointing or
10 attempting to appoint a "special prosecutor," however denominated, to investigate
11 and prosecute allegations of criminal wrongdoing within the Territory of Guam.
12

13 5. Award plaintiff reasonable costs and attorneys fees.

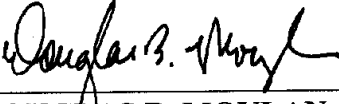
14 6. Award plaintiff such other relief as the Court deems necessary and just.

15
16 **VERIFICATION**

17 I, **DOUGLAS B. MOYLAN**, the undersigned, being first duly sworn, depose and say:

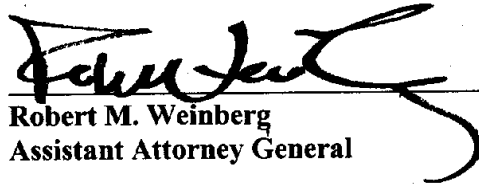
18 That I am the duly elected Attorney General of the Government of Guam, and that I
19 have read the foregoing complaint and to the best of my knowledge and belief, the matters
20 therein stated are true and correct, except as to any matters alleged upon information and belief,
21 and as to those matters I believe them to be true.

22 Sworn to under penalty of perjury this the 13th day of July 2004.

23 
24 **DOUGLAS B. MOYLAN**
25 Attorney General

1 Respectfully submitted this 13th day of July, 2004.

2 OFFICE OF THE ATTORNEY GENERAL
3 DOUGLAS B. MOYLAN
4 Attorney General of Guam

5 
6 Robert M. Weinberg
7 Assistant Attorney General



Office of the Governor of Guam

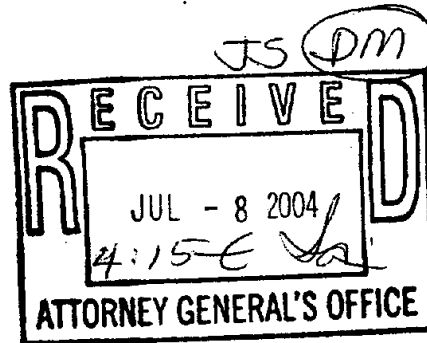
P.O. Box 2950 Hagåtña, Guam 96932

TEL: (671) 472-8931 • FAX: (671) 477-4826 • EMAIL: governor@mail.gov.gu

JS/DM

Felix Perez Camacho
Governor

Kaleo Scott Moylan
Lieutenant Governor



06 JUL 2004

Douglas B. Moylan
Attorney General of Guam
Guam Judicial Center, Suite 2-200E
120 West O'Brien Drive
Hagåtña, Guam 96910

Re: Investigation into Possible Procurement Violations

Dear Attorney General Moylan:

Although I am not at liberty to discuss any ongoing investigation, I would like to point out what I would categorize as the obvious. Contrary to your non-judicial interpretation of the Organic Act of Guam, as Governor, I am responsible for the faithful execution of the laws of Guam. With this responsibility, comes the ability to appoint, when appropriate, a special prosecutor to perform prosecutorial functions whenever there is a conflict that would preclude the Office of the Attorney General from representing the People or the government of Guam. The power and prerogative of the Governor to appoint a special prosecutor has been affirmed by the courts of Guam in *People v. Camacho*, 1 Guam Rep. 501, and *Government of Guam v. United States*, D.C. Guam 1982, Civ. No. 82-0001, and most recently in *People v. Moylan*, Superior Court of Guam Case No. CM0864-03, Decision and Order dated January 23, 2004.

Because the investigation pertains to possible wrongful actions by the Office of the Attorney General, I am precluded from disclosing to you the results from an ongoing investigation into the activity of the Office of the Attorney General. This would truly be a breach of the public's confidence in this office's ability to faithfully execute the laws of Guam. I am sure as an officer of the court you could appreciate my concern.

Sinseru yan Magåhet,

FELIX P. CAMACHO
I Maga' låhen Guåhan
Governor of Guam

EXHIBIT 1